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6 Attorneys for Defendants
7 UHS OF DELAWARE, INC.
and UHS OF SPRING MOUNTAIN, INC.

8 UNITED STATES DISTRICT COURT
9
10 DISTRICT OF NEVADA

11 VILIKA VANDEN BRINK,
12
13 Plaintiff,

14 vs.

15 UHS OF DELAWARE, INC., a Delaware
Corporation, UHS OF SPRING
16 MOUNTAIN, INC., A Delaware
Corporation, DOES 1-50 and ROES 1-50,
17
18 Defendants.

Case No. 2:19-cv-00008-MMD-PAL

**[PROPOSED] STIPULATION AND ORDER
TO EXTEND TIME FOR DEFENDANT TO
FILE RESPONSIVE PLEADING**

[FIRST REQUEST]

19 Plaintiff VILIKA VANDEN BRINK ("Plaintiff") and Defendants UHS OF DELAWARE,
20 INC. and UHS OF SPRING MOUNTAIN, INC. ("Defendants"), by and through their undersigned
21 counsel, hereby agree and stipulate to extend the time for Defendant to file a responsive pleading
22 from the current deadline of January 30, 2019 up to and including **February 13, 2019**.

23 As Defense counsel was recently retained in this case, this extension is necessary to provide
24 adequate time for Defense counsel to become familiar with the allegations in the Complaint and to
25 prepare a responsive pleading.

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1 This is the first request for an extension of time to respond to the Complaint. This request is
2 made in good faith and not for the purpose of delay.

3 Dated: January 28, 2019

Dated: January 28, 2019

4 Respectfully submitted,

Respectfully submitted,

5
6 /s/ Eran S. Forster

7 DANIEL R. WATKINS, ESQ.
8 ERAN S. FORSTER, ESQ.
9 WATKINS & LETOFSKY, LLP

10 Attorneys for Plaintiff
11 VILIKA VANDEN BRINK

/s/ Hilary B. Muckleroy

WENDY MEDURA KRINCEK, ESQ.
HILARY B. MUCKLERROY, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Defendants
UHS OF DELAWARE, INC.
and UHS OF SPRING MOUNTAIN, INC.

12 **ORDER**

13 **IT IS SO ORDERED.**

14 Dated: January 29, 2019.

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17 UNITED STATES MAGISTRATE JUDGE

18 FIRMWIDE:162081676.1 069080.1000